



Yakima Neighborhood Health Services
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May 5, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th street, SW
Room TW-A325
Washington, D.C. 20554

Re: Rural Health Care Program: Request to Promptly Approve Emergency Petition for Waiver of the Funding Cap Pending Conclusion of the Open Rulemaking

Dear Ms. Dortch,

Yakima Neighborhood Health Services (YNHS) is writing to strongly urge the Commission to approve the Emergency Petition for Waiver of the Rural Health Care Program (RHCP) Funding Cap Pending Conclusion of the Open Rulemaking, which was recently filed by the Schools, Health & Libraries Broadband (SHLB) Coalition.

YNHS is a private non-profit Community Health Center that provides comprehensive primary health care, social services and housing to low-income individuals and families throughout Yakima County, Washington.

Last year YNHS staff provided care to over 23,000 unduplicated medical and dental patients, 10% of whom were homeless. 80 percent of YNHS patients are families whose income fell below the federal poverty level and 3,500 of these low-income patients were uninsured, and not eligible for public health coverage assistance. Last year 65% of our patients were Hispanic and nearly one third of patients were best served in a language other than English. Over the past few years we have expanded our sites to more rural communities in order to make health care services more accessible to vulnerable populations. Access to affordable broadband services has been critical for us to provide these services to our rural patients and clients.

YNHS strongly urges the FCC to promptly approve the Emergency Petition for Waiver of the RHCP Funding Cap Pending Conclusion of the Open Rulemaking, for the following reasons:

- The reductions in FY2017 RHCP payments to rural FQHCs are in direct contradiction to Congress' and HHS' long-standing efforts to expand EHRs and telehealth in rural communities.
- The reductions in FY2017 RHCP payments to rural FQHCs are significant, unexpected and largely-retroactive – and particularly difficult for small safety-net providers to absorb.



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Patient Centered Medical Home Level 3



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- Given the size of the FY2017 reductions – and the unpredictability of future payment amounts – many rural FQHCs are considering giving up activities that require broadband access, despite significant pressure from Congress and HHS to engage in these activities.
- Both the \$400 million cap and FCC oversight of the RHCP are outdated, and rural safety-net providers should not be penalized while waiting for the FCC to complete its updates of both.
- Given that rural providers and carriers are presently determining if -- and under what terms -- they will participate in the RHCP in FY18, the FCC should approve the emergency waiver promptly.

Thank you for your attention to this request, and for your efforts to increase access to care for medically underserved patients in rural areas. Please feel free to contact me directly if you would like additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Anita Monoian".

Anita Monoian, President and CEO
Yakima Neighborhood Health Services



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